

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

**ROBERT O. GONZALEZ, JR.,**  
**Plaintiff,**

**V.**

**MASSACHUSETTS MUTUAL LIFE  
INSURANCE COMPANY,**  
**Defendant.**

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**Civil Action No. 5:15-cv-00798-OLG**

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**PLAINTIFF'S DESIGNATION OF EXPERT WITNESSES  
(RESISTING CLAIMS FOR RELIEF)**

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TO THE HONORABLE UNITED STATES DISTRICT COURT:

Pursuant to the Scheduling Order (ECF 8) in this case and FRCP 26(a)(2), Plaintiff, ROBERT O. GONZALEZ, JR., files this Designation of Expert Witnesses (both on affirmative claims for relief and in defense of Defendant's counterclaims) and would show the following:

**(B) Witnesses Who Must Provide a Written Report**

Eric Brahlin, MD  
2600 SW Military Dr., Suite 100  
San Antonio, TX 78224  
(210) 923-2700

Daniel Perkins  
Law Office of J. Daniel Perkins, PLLC  
1415 Harroun  
McKinney, TX 75069  
(972) 529-1111

**(C) Witnesses Who Do Not Provide a Written Report**

Alamo City Medical Group  
Including but not limited to:

Krueger, PA-C, Dennis  
14114 US Hwy 87  
La Vernia, TX 78121  
*Primary Care Physician*

Bexar County Medical Examiners Office  
7337 Louis Pasteur  
San Antonio, TX 78229-4565  
(210) 335-4003  
*Autopsy*

Concentra Physical Therapy  
Including but not limited to:  
Diekhoff, PT, Gary  
3453 IH 35 North, Ste. 110  
San Antonio, TX 78219  
(210) 226-7767  
*Physical Therapy*

Connally Memorial Medical Center  
499 10<sup>th</sup> Street  
Floresville, TX 78114  
(830) 393-1300  
*Hospital*

Dearborn National Life Insurance Company  
1020 31<sup>st</sup> St.  
Downers Grove, IL 60515  
(800) 778-2281  
*Life insurer – Faleana Gonzalez*

Dermatology Associates of San Antonio  
Including but not limited to:  
Walker, MD, Lisa C.  
18540 Sigma Rd.  
San Antonio, TX 78258  
*Identified by Defendant*

Falcon, DDS, Paul  
1926 Pleasanton Rd.  
San Antonio, TX 78221  
(210) 924-1811  
*Dentist*

Health Texas Medical Group  
20821 US Highway 218 N

San Antonio, TX 78258  
(210) 546-1600  
*Identified by Defendant*

H-E-B Pharmacy  
P.O. Box 101047  
San Antonio, TX 78201-9047  
*Pharmacy*

Hoffman, MD, Stephen Francis  
26 Falls Terrace  
Fair Oaks Ranch, TX 78015  
*Identified by Defendant*

Humana Insurance Company  
P.O. Box 14635  
Lexington, KY 40512  
(800) 833-6917  
*Life & health insurer – Faleana Gonzalez*

ICS Merrill  
EMSI Investigative Services Division  
Including but not limited to:  
Heaney, Robert  
3050 Regent Blvd., Ste. 400  
Irving, TX 75063  
(808) 725-2167  
*Identified by Defendant*

ICS Merrill  
EMSI Investigative Services Division  
Including but not limited to:  
Renhack, Roland  
9485 Regency Square Blvd., Ste. 400  
Jacksonville, FL 32225  
(904) 562-1553  
*Identified by Defendant*

Koehler, DC, Cliff  
4040 SW Military Dr.  
San Antonio, TX 78211  
(210) 923-3861  
*Chiropractor*

La Vernia H-E-B Pharmacy  
14414 US Hwy 87 West

La Vernia, TX 78121-5922  
*Pharmacy*

Lincoln Benefit Life Insurance Company  
2920 S. 84<sup>th</sup> St.  
Lincoln, NE 68506  
(877) 525-5727  
*Life insurer – Faleana Gonzalez*

MML Investor Services  
Including but not limited to:  
Becknell, George  
Daye, Tanya  
Kussatz, Vonnie  
70 NE Loop 410, Ste. 730  
San Antonio, TX 78216  
(210) 581-9656  
*Agent who sold life insurance policy*

Massachusetts Mutual Life Insurance Company  
Including but not limited to:  
Ferris, Tom  
Matras, Diane  
Patterson, RN, Janet  
Surmik, John  
Temlak, Julie  
Wallner, Robyn  
c/o Figari + Davenport  
901 Main St., Suite 3400  
Dallas, TX 75202  
(214) 939-2000  
*Defendant*

North Central Baptist Hospital  
520 Madison Oak Dr.  
San Antonio, TX 78258  
(210) 297-4000  
*Hospital*

Northeast OB/GYN  
Including but not limited to:  
Murdoch, MD, Tammy  
Sadler, MD, Randall Kent  
Womack, MD, Robin  
502 Madison Oak Dr., #240  
San Antonio, TX 78233

(210) 653-5501  
*Gynecologist / OB/GYN*

Partners in Primary Care f/k/a Alamo City Medical Group  
2235 Thousand Oaks Dr., Ste. 117  
San Antonio, TX 78232  
(210) 490-1000  
*Identified by Defendant*

Perinatal Fertility Specialists of San Antonio, PA  
Including but not limited to:  
McFarland, MD, Melinda  
502 Madison Oak Dr., Ste. 210  
San Antonio, TX 78258  
(210) 481-3000  
*Gynecologist / OB/GYN*

Scheuerman, Tyler  
Scheuerman Law Firm, PLLC  
322 West Woodlawn Ave.  
San Antonio, TX 78212  
(210) 735-2233  
*Will testify on reasonable and necessary attorney's fees*

Theis, Jr., M.D., Vernon  
502 Madison Oak Dr., Suite 240  
San Antonio, TX 78258  
*Identified by Defendant*

University Physicians Group  
Including but not limited to:  
Leytham, MD, Thomas Joseph  
75 University Blvd. S  
VCOM 6000  
Mobile, AL 36688  
*Identified by Defendant*

The custodians of records for any and all individuals or entities identified herein.

All witnesses identified by Defendants.

Respectfully submitted,



By: \_\_\_\_\_  
S. Tyler Scheuerman  
State Bar No. 00791610

**SCHEUERMAN LAW FIRM, PLLC**  
322 West Woodlawn Ave.  
San Antonio, Texas 78212  
(210) 735-2233  
(210) 735-2235 – facsimile  
tyler@sch-lawfirm.com

**ATTORNEYS FOR PLAINTIFF**

**CERTIFICATE OF SERVICE**

Pursuant to the Federal Rules of Civil Procedure, a true and correct copy of the forgoing document was delivered to the following parties on March 10, 2016:

Andrew Whitaker  
Figari + Davenport, LLP  
901 Main Street, Suite 3400  
Dallas, TX 75202-3776



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Tyler Scheuerman